

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
WESTERN DIVISION**

)
Devin G. Nunes,
Plaintiff,
v.
Ryan Lizza and Hearst Magazines, Inc.,
Defendants.
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) Case No. 5:19-cv-04064-CJW-MAR
)
) Declaration of Ravi V. Sitwala in
) Support of Defendants' Motion to
) Dismiss, to Strike the Complaint
) Pursuant to Cal. Civ. Proc. Code
) § 425.16, and to Strike Pursuant to
) Fed. R. Civ. P. 12(f)
)
)

I, RAVI V. SITWALA, declare as follows:

1. I represent defendants Ryan Lizza and Hearst Magazines, Inc. (“Defendants”) as an attorney of record in this case. I make this declaration of personal knowledge and if called as a witness I could and would testify competently to the facts stated herein.
2. Annexed hereto as **Exhibit A** is a true and correct copy of an article by Ryan Lizza entitled “*Devin Nunes’s Family Farm Is Hiding a Politically Explosive Secret*,” which was published on September 30, 2018 at <https://www.esquire.com/news-politics/a23471864/devin-nunes-family-farm-iowa-california/> (the “Article”). This article is quoted and referenced throughout the Complaint of California Congressman Devin G. Nunes, the Plaintiff.
3. Esquire.com is a publication of Hearst Magazine Media, Inc., an affiliate of Hearst Magazines, Inc. “Hearst Magazines, Inc.” the named defendant, does not publish *Esquire* or Esquire.com, and has no relevance or relationship to the facts alleged in the Complaint.
4. Annexed hereto as **Exhibit B** is a true and correct copy of the Article as published in the November 2018 print edition of *Esquire* magazine, a publication of Hearst Magazine

Media, Inc., together with the cover of that edition of *Esquire*. This article is quoted and referenced throughout the Complaint of California Congressman Devin G. Nunes, the Plaintiff.

5. Annexed hereto as **Exhibit C** is a true and correct copy of a memorandum from the House Permanent Select Committee on Intelligence (“House Intelligence Committee”) Majority Staff to House Intelligence Committee Majority Members, entitled “Foreign Intelligence Surveillance Act Abuses at the Department of Justice and the Federal Bureau of Investigation,” dated January 18, 2018 and declassified by order of the President on February 2, 2018. Acting at my direction, an attorney in my office retrieved a copy of this official publication from the House Intelligence Committee website at <https://docs.house.gov/meetings/IG/IG00/20180129/106822/HMTG-115-IG00-20180129-SD001.pdf>.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York, on January 21, 2020.

/s/ Ravi V. Sitwala
Ravi V. Sitwala

Certificate of Service

The undersigned certifies that a true copy of **Declaration of Ravi V. Sitwala in Support of Defendant's Pre-Answer Motion to Dismiss, to Strike the Complaint Pursuant to Cal. Civ. Proc. Code § 425.16, and to Strike Pursuant to Fed. R. Civ. P. 12(f) (Oral Argument Requested)** was served upon the following parties through the court's CM/ECF electronic filing system on January 21, 2020.

/s/ Jonathan R. Donnellan

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